

Empfänger / Receiver

U.S. Department of Transportation Dockets
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Subject: Comments to NPRM 00-09, *"Improved Flammability Standards for Thermal/Acoustic Insulation Materials Used in Transport Category Airplanes"* Docket No. FAA2000-7909 - 3 |

Dear Madam / Sir,

Since we followed the development of the above mentioned NPRM and the inputs made by the International Aircraft Materials Fire Test Working Group (IAMFTWG) we believe that there are problems with both proposals. In Detail we would like to add following comments:

1. Flame Propagation

In most cases there is an afterflame time up to one second. Therefore we would like to propose the following criteria:

- No flame after five seconds
- The after flame time has to be an **average**, because the testing is too susceptible for human errors. The material will afterburn very easily if the burner is not removed quickly enough.

1. Wording of Para 25.853

The wording of Para 25.853 *"or equivalent approved FAA test method"* should be revised to **"approved equivalent test method"**.

2. Missing Round Robin Tests

Due to the experience made with other flammability test methods e.g. OSU-Test, it is essential to perform a sufficient number of Round Robin Tests in order to define final tolerances of the requirements for both tests and to integrate final changes before publication.

3. Cost

We believe that the cost for the aircraft modification according to the new regulation would be much higher than the estimates in the NPRM. Additional cost factors such as long ground times, documentation, engineering, scrapping under environmental regulations, small modifications on aircraft structure to allow proper blanket installation have to be taken into consideration.

Best Regards

Thomas Aigner
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Maintenance Management

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Note: A Paper Version of this E-mail will be sent by courier